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Attorneys for Defendant
CITY OF SAN LEANDRO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

INTERNATIONAL CHURCH OF THE
FOURSQUARE GOSPEL

Plaintiff,

v.

CITY OF SAN LEANDRO, TONY
SANTOS (in his official capacity),
SURLENE G. GRANT (in her official
capacity), DIANA M. SOUZA (in her
official capacity), JOYCE R.
STAROSCIAK (in her official capacity),
BILL STEPHENS (in his official capacity),
JIM PROLA (in his official capacity),
JOHN JERMANIS (in his official and
individual capacities), DEBBIE POLLART
(in her official and individual capacities),
DOES 1-50.

Defendants.

Case No. C 07-03605 PJH

**DECLARATION OF KIMBERLY M.
DRAKE IN SUPPORT OF
STIPULATED REQUEST FOR
EXTENSION OF NON-EXPERT
DISCOVERY CUTOFF**
[Civil L.R. 6-2(a)]

Honorable Phyllis J. Hamilton
Complaint Filed: 7/12/07

1 FAITH FELLOWSHIP FOURSQUARE
2 CHURCH,

3 Real Party in Interest
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6 1. The parties have stipulated and agreed to move out the Non-Expert Discovery
7 cutoff for 60 days, from March 31, 2008 to May 30, 2008. A Stipulation to this effect, signed by
8 counsel for all affected parties, is filed herewith.

9 2. The discovery extension is necessary due to the reasonable delay that occurred by
10 consent of all counsel to reinstate settlement discussions, without incurring attorney's fees on the
11 extensive slate of depositions noticed for dates in March 2008, and the sheer scheduling feat
12 presented by the parties' noticing of 14 depositions, and possibly more, for completion before
13 March 31, 2008.

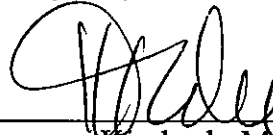
14 3. No trial date has been set in this case.

15 4. There have been no previous time modifications by Stipulation or Court order.

16 5. The parties are not requesting to change any other dates on the pretrial schedule.

17 DATED: March 6, 2008

18 By: _____



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